



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Farmington District Office  
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Farmington, New Mexico 87401



October 31, 2005

In Reply Refer To:  
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Ref: IM-NM-200-2006-002

### EMS TRANSMISSION

Instruction Memorandum No. IM-NM-200-2006-002

Expires: 09/30/2007

To: Farmington Field Office, All Employees

From: District Manager

Subject: Implementation of IM 2005-247

**Program Areas:** Oil/Gas, Environmental Coordination, Lands and Realty (ROWs)

**Purpose:** Provide Field Office specific guidance on implementation of Washington Office IM 2005-247, including use of new Categorical Exclusion (CX) categories and documentation requirements.

**Authority:** Section 390 of the Energy Policy Act of 2005

**Policy/Action:** Effective immediately, all new APDs and any pending APDs which do not have completed EAs will be reviewed to determine if a CX can be applied. Proposed actions within ACECs or RNAs will continue to be analyzed in an EA. A CX narrative worksheet for documenting RMP conformance and NEPA compliance is attached. The information listed under each CX is required to justify its use. The most appropriate CX should be checked. Fill in any blanks to provide the necessary information. When using CX categories 1 or 5, provide the information required in the form of a narrative.

In considering application of CX category 3, any new road segment associated with the APD will be included in the CX. Well ties, as long as the pipeline is buried within the ROW for the road would also be included in the CX. However, any new pipelines not placed in existing ROWs, or in situations where a DNA can not be applied, will require an EA.

Use of the new CX categories does not remove any of our responsibilities under existing environmental legislation including the Endangered Species Act, National Historic Preservation Act, Clean Air Act, and Clean Water Act. All well files must contain documentation of interdisciplinary permit review. Onsite exams will still be conducted on 100 percent of proposed well and road locations. Appropriate mitigation and BMPs will be applied to all permitted actions as COAs and attached to the CX narrative worksheet. All agreements made during the onsite, including those with grazing permit holders, will be documented and included in the COAs.

The onsite examination and development of COAs will remain the most important part of the APD approval process. During an onsite, if agreement can not be reached as to the appropriate well location or mitigation measures, an EA will be required to assess conformance with the RMP and analyze impacts.

**Budget Impact:** Budget savings should be realized due to reduced time spent preparing and reviewing environmental documentation. This should permit staff more time to focus on onsite reviews and development of Conditions of Approval.

**Background:** IM 2005-247 directs the Field Offices to immediately incorporate changes to NEPA procedures used in analyzing and reviewing oil, gas, geothermal, and energy-related projects.

On September 30, 2005 the BLM Washington Office issued Instruction Memorandum No. 2005-247 to provide guidance on implementation of the Energy Policy Act of 2005 as it relates to NEPA compliance. Specific to the Farmington Field Office the most applicable guidance focuses on 5 new Categorical Exclusions, use of multiple well EAs, and expanded use of Documentation of NEPA Adequacy (DNA).

**Manual Sections Affected:** NEPA Handbook H-1790-1

**Coordination:** Development of CX narrative worksheet was coordinated with Tom Hare (WO-310). Answers to additional questions regarding implementation were incorporated into local guidance.

**Contact:** Direct any questions regarding this guidance to Jim Ramakka, Planning and Environmental Coordinator (505-599 6307), [jim\\_ramakka@nm.blm.gov](mailto:jim_ramakka@nm.blm.gov).

Authenticated by:  
Eileen Armenta  
Records Manager, NM-200

Signed by:  
Steve Henke  
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## 2 Attachments

- 1 – IM 2005-247
- 2 - CX Plan Conformance/NEPA Compliance Record